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OCT 26 2009    United States District Court

U. S. DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DISTRICT OF MO  
ST. LOUIS

GREGORY MCKENNA,

Plaintiff

Vs.

THE ST. LOUIS COUNTY POLICE DEPARTMENT,  
OFFICERS CHARLES BOSCHERT, KENNETH  
WILLIAMS, 8 UNKNOWN AGENTS OF THE  
FEDERAL BUREAU OF INVESTIGATION,  
MARK KAPPELHOFF, APPLE INC., A-1  
PRIVATE INVESTIGATIONS, TIMOTHY  
BONINE, D'ANGELO AUTOMOTIVE,

Case No. 4:09cv1113CDP

JURY DEMANDED

Defendants

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**PLAINTIFF'S MOTION FOR STAY OF PROCEEDINGS**

COMES NOW, pro se Plaintiff Gregory McKenna and for his cause of action moves this Honorable Court to stay proceedings in this matter for a period of time to be determined by the Court for the following stated reasons:

- (1) On or around July 16, 2009, Plaintiff filed a Complaint in this matter against Defendants the St. Louis County Police Department (STLPD), Charles Boschert, Kenneth Williams, Unknown Agents of the FBI, Mark Kappelhoff, Apple Inc., A-1 Private Investigations, Timothy Bonine, and D'Angelo Automotive for conspiring to violate Plaintiff's constitutional rights, interfering with Plaintiff's constitutional rights, neglecting to prevent, intentional infliction of emotional distress, aiding and abetting, and others.
- (2) The primary focus of Plaintiff's Complaint is that the Defendants conspired with the Italian Mafia to commit unlawful acts in their designated professions to perpetuate

stalking, extortion, exaction, and torture of Plaintiff. The most salient means by which the mafia has accomplished their unlawful designs is through planting illegal communication devices in Plaintiff's St. Louis County and Los Angeles residences, 1998 Audi A4 Quattro, Apple iPods, Apple computers, workplace, church, and other public venues. The devices are being used to exact, torture, and assault Plaintiff, deter him from seeking law enforcement assistance, control his career and income, prevent him from establishing relationships, and other means to accomplish isolating, manipulating, and preying on him.

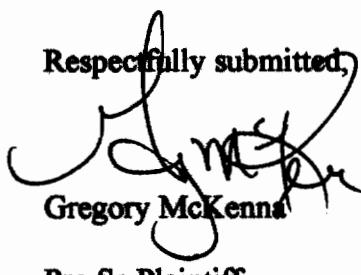
- (3) Proof of the existence of the devices was established based on the discovery of bugged electronic devices, positive confirmations of bug sweeps conducted by Plaintiff and private investigators, audio and video recordings of death threats and harassment from the devices, witness' testimonies to harassment from the devices, Plaintiff's testimony as a witness, and other evidence.
- (4) Plaintiff's pain and suffering as a crime victim continues to the present day. Proof of the continuing crimes is based on recent recordings of death threats stating, "I'm about to kill him," recent recordings of harassment from the devices in public venues, new evidence of witness tampering, continued sleep deprivation and torture, controlling of Plaintiff's career and income, law enforcement's continued criminal neglect despite knowledge of the crimes, and other evidence.
- (5) On October 8, 2009 and October 23, 2009, Plaintiff filed an Emergency Motion for Temporary Restraining Order and Motion for Emergency Preliminary Injunction to seek relief for law enforcement's malicious neglect. Particularly, Plaintiff petitioned the Court

for enforcement of the US Crime Victims' Rights Act, Illegal Communications Act, the First, Fourth, Eighth, and Fourteenth Amendments, and other laws and statutes currently being violated. Pursuant to the US Crime Victims' Rights Act, Plaintiff has "a right to reasonable protection from the accused" (See 18 USC § 3771(a)(1)). Additionally, the Communications Act of 1934 states that preliminary and other equitable or declaratory relief is appropriate when any person whose wire, oral, or electronic communication is intercepted, disclosed, or intentionally used in violation of 18 USC § 2511 in a civil action (See 18 USC § 2520(b)(1)). Concurrently, Plaintiff is entitled to preliminary relief.

- (6) The continuing crimes prove that the mafia will make no effort to end the stalking, extorting, and exacting, and, a conspiracy to obstruct justice exists. Accordingly, Plaintiff's life and the lives of witnesses and others are in danger and will continue to be in danger unless Plaintiff is granted reasonable protection from the mafia, an investigation is ordered to end the mafia conspiracy, and mafia conspirators are identified. The Plaintiff's will remain in danger unless the acts of violence against Plaintiff, witness tampering, criminal concealment of evidence, and efforts to obstruct justice end.
- (7) The current conspiracy to obstruct justice is a violation of Plaintiff's Fourteenth Amendment right to Due Process. Concurrently, because the mafia crimes continue and the Defendant law enforcement officials have maliciously refused to investigate, Plaintiff cannot proceed in this lawsuit until the stalking, extortion, torture, and conspiracy to obstruct justice end. If an injunction is not granted, the mafia will be allowed to continue in their unlawful designs to defeat justice and violate Plaintiff's constitutional rights.

WHEREFORE, Plaintiff Gregory McKenna respectfully requests that this Honorable Court stay the proceedings in this matter for a period of time to be set by the Court until the acts of violence against Plaintiff, witness tampering, criminal concealment of evidence, and efforts to obstruct justice come to an end.

Respectfully submitted,



Gregory McKenna

Pro Se Plaintiff

9937 Young Drive, H

Beverly Hills, CA 90212\

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 24 day of October, 2009, a true and accurate copy of Plaintiff's Motion to Stay Proceedings will be forwarded to the Defendants, via first-class mail, postage prepaid, to:

- 1) Defendants the St. Louis County Police Department, Officers Charles Boschert, & Kenneth Williams, 7900 Forsyth Boulevard, Clayton, Missouri 63105;
- 2) Defendant the FBI, US Attorney's Office, 111 South 10<sup>th</sup> Street, #20.333, St. Louis, MO 63102;
- 3) Defendant Apple Inc. represented by Thompson Coburn LLP, Kathy A. Wisniewski & John W. Rogers, One Bank Plaza, St. Louis, MO 63101;
- 4) Defendant D'Angelo Automotive, 1104 North Jefferson, Florissant, MO 63031.

(NOTE: Defendants Mark Kappelhoff and A-1 Private Investigations have defaulted. An issuance of an alias summons is pending for Defendant Bonine. A copy of this Motion will be sent to Defendant Bonine when an alias summons is issued.)